

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- against -

MARK NORDLICHT,  
DAVID LEVY,  
URI LANDESMAN,  
JOSEPH SANFILIPPO,  
JOSEPH MANN,  
DANIEL SMALL, and  
JEFFREY SHULSE,

Defendants.

No. 16-cr-640 (DLI)

**DECLARATION OF WILLIAM A. BURCK**

I, William A. Burck, declare pursuant to 28 U.S.C. § 1746 as follows:

1. I am a partner of the law firm Quinn Emanuel Urquhart & Sullivan, LLP and a member in good standing of the bar of the State of New York and this Court. I respectfully submit this declaration in support of Defendant Mark Nordlicht's reply memorandum of law in further support of his motion regarding potential violations of Fed. R. Crim. P. 6(e).

2. On June 21, 2016, FBI Special Agent Craig Minsky sought and obtained a warrant to search the office of Platinum Partners. A copy of the warrant application, including Special Agent Minsky's affidavit in support of the application, is attached to this declaration as Exhibit A.

3. On June 8, 2016, a grand jury in the Eastern District of New York issued a subpoena to Platinum Management (NY) LLC. A copy of the subpoena is attached to this declaration as Exhibit B.

4. On November 17, 2016, the court in *United States v. Walters*, No. 16-cr-338 (S.D.N.Y.) granted the defendant's motion for an evidentiary hearing. A copy of the order is attached to this declaration as Exhibit C.

5. On August 1, 2016, *Debtwire* published an article by Marion Halftermeyer titled "Northstar Offshore Group struggling to keep afloat amidst Black Elk restructuring, Platinum Partners dealings." A copy of the article is attached to this declaration as Exhibit D.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Date: May 3, 2017

/s/ William A. Burck  
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William A. Burck